

**To:** Nordgren, Judith[Judith\_Nordgren@americanchemistry.com]  
**From:** Courtnage, Robert  
**Sent:** Fri 7/14/2017 6:50:35 PM  
**Subject:** RE: Question regarding gaskets

Thank you for this list.

Also, as an FYI, myself and another EPA colleague spoke with a representative of Bergeson and Campbell, PC, (representing Oxy Chem) today after I was contacted by him following a meeting with EPA earlier in the week. He provided some additional discussion on diaphragm manufacture on behalf of Oxy Chem. We thanked him for this and also said we are interested in knowing what the differences were (even if minor and in compliance with regulatory requirements) for the asbestos handling practices at the plants we didn't visit.

Thanks and have a great weekend.

Robert T. Courtnage

Associate Chief

Fibers and Organics Branch

National Program Chemicals Division

Office of Pollution Prevention and Toxics/OCSP

U.S. Environmental Protection Agency

202.566.1081 (Desk)

202.740.2993 (Mobile)

**From:** Nordgren, Judith [mailto:Judith\_Nordgren@americanchemistry.com]  
**Sent:** Friday, July 14, 2017 2:35 PM  
**To:** Courtnage, Robert <Courtnage.Robert@EPA.GOV>  
**Subject:** RE: Question regarding gaskets

Dear Robert,

I hope you're doing well. Please find attached site locations using chrysotile asbestos diaphragm technology in their manufacturing process. Let me know if you have any questions. I'm currently on business travel but will be back in the office Monday morning.

All the best,

Judith

**Judith Drew Nordgren** | American Chemistry Council

Managing Director Chlorine Chemistry Division

700 2<sup>nd</sup> Street NE Washington DC 20002

O | 202.249.6709

[www.americanchemistry.com/chlorine](http://www.americanchemistry.com/chlorine)

**From:** Courtnage, Robert [<mailto:Courtnage.Robert@EPA.GOV>]

**Sent:** Tuesday, July 11, 2017 8:11 AM

**To:** Nordgren, Judith

**Subject:** RE: Question regarding gaskets

Thanks Judith for getting that info for us. Yes, I was aware of Axial's affiliation with Westlake and that they are not an ACC member.

Best,

-Robert

**From:** Nordgren, Judith [[mailto:Judith\\_Nordgren@americanchemistry.com](mailto:Judith_Nordgren@americanchemistry.com)]  
**Sent:** Tuesday, July 11, 2017 7:38 AM  
**To:** Courtnage, Robert <[Courtnage.Robert@EPA.GOV](mailto:Courtnage.Robert@EPA.GOV)>  
**Subject:** RE: Question regarding gaskets

I don't have that readily at my disposal but we'll get it from my members. Just so you know, Axial is now owned by Westlake Chemical; I believe they acquired that company a couple of years ago. They are not American Chemistry Council or Chlorine Chemistry Division members.

Thanks,

Judith

**Judith Drew Nordgren** | American Chemistry Council

Managing Director Chlorine Chemistry Division

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**From:** Courtnage, Robert [<mailto:Courtnage.Robert@EPA.GOV>]  
**Sent:** Tuesday, July 11, 2017 7:29 AM  
**To:** Nordgren, Judith  
**Subject:** Re: Question regarding gaskets

Thanks for the update. Did you by chance already supply the name and addresses of member plants that currently use asbestos diaphragms? If not, is that something relatively easy to come by? I believe there were 14, not including the Axial plant.

Best-

Robert T. Courtnage

Associate Chief

Fibers and Organics Branch

National Program Chemicals Division

Office of Pollution Prevention and Toxics

202.566.1081

Sent by my iPhone

On Jul 11, 2017, at 7:15 AM, Nordgren, Judith <[Judith\\_Nordgren@americanchemistry.com](mailto:Judith_Nordgren@americanchemistry.com)> wrote:

Dear Robert,

I hope y'all had a wonderful Independence Day and backyard events.

I've heard back from Chemours regarding your questions. They are reaching out to their supplier for more information, so please stand by. The holiday has prolonged closing this loop but they are working on it.

I hope to have a response for you by the end of the week or early next week. And let me know if you would like me to make the appropriate introductions.

All the best,

Judith

Judith Drew Nordgren | American Chemistry Council  
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-----Original Message-----

From: Courtnage, Robert [<mailto:Courtnage.Robert@EPA.GOV>]

Sent: Friday, June 30, 2017 8:30 AM

To: Nordgren, Judith

Subject: RE: Question regarding gaskets

Hi Judith- My family and I are looking forward to hosting several families for a nice backyard event. I hope you enjoy the holiday as well.

As far gaskets, we do mention them in the scope. See page 23.

#### Sheet Gaskets

During the public comment period, one chemical production company notified EPA of the current use of imported gaskets from China (Comment ID EPA-HQ-OPPT-2016-0736-0067).

These sheet gaskets are composed of 80% (minimum) chrysotile asbestos, encapsulated in Styrene Butadiene Rubber, and used to create tight chemical containment seals during the production of titanium dioxide.

I will definitely take you up on the offer for more info, one initial question I have is if there is any additional fabrication of the sheet gaskets in the United States, meaning does Chemours, or someone else in the supply chain, further fabricate the gaskets from a sheet that it receives from China, or are the products they use already fabricated and the gasket directly installed without further fabrication?

Best,

-Robert

Robert T. Courtnage

Associate Chief

Fibers and Organics Branch

National Program Chemicals Division

Office of Pollution Prevention and Toxics/OCSPP U.S. Environmental Protection Agency

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-----Original Message-----

From: Nordgren, Judith [[mailto:Judith\\_Nordgren@americanchemistry.com](mailto:Judith_Nordgren@americanchemistry.com)]

Sent: Thursday, June 29, 2017 4:58 PM

To: Courtnage, Robert <[Courtnage.Robert@EPA.GOV](mailto:Courtnage.Robert@EPA.GOV)>

Subject: Question regarding gaskets

Dear Robert,

I hope you're doing well and preparing for a long Independence Day weekend.  
Unfortunately, by the time I learned we have both Monday and Tuesday off the airfare to Louisiana was cost-prohibitive.

Question, Chemours, a Chlorine Chemistry Division's Associate Member, submitted comments to the docket addressing gaskets containing chrysotile asbestos. Chemours uses such gaskets for their high-temperature performance qualities.

The June 22 Scope of the Risk Evaluation for Asbestos did not include any gasket reference information. Is that product category part of your portfolio and if so, do you or your team need additional information? I'd be happy to facilitate introductions, meetings and/or fill any information/data gaps. Just let me know.

Thanks a million,

Judith

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